

COMPLAINTS

In accordance with the "Provisions on the transparency of banking and financial operations and services. Correctness of relationships between intermediaries and clients" issued by the Bank of Italy as of 29 July 2009 and subsequent amendments and additions, the purpose of this paragraph is to report on the management of Complaints received in the period from 1 January 2019 to 31 December 2019 (hereinafter the "Reference Period").

In particular, current legislation provides for both information obligations and organisational requirements for the handling of complaints, such as the adoption of procedures that provide for:

- the methods for the forwarding of complaints by customers and the response by intermediaries which, in any case, provide for ordinary mail and electronic mail;
- no charge for the customer for interaction with the complaints department and any call center, without prejudice to the costs normally associated with the means of communication adopted (e.g. the cost of telephone calls at no extra charge);
- the method of handling complaints;
- maximum response times;
- the recording of the essential elements of each complaint received, as well as any measures taken to resolve the problem raised.

In compliance with these provisions, but above all because of the importance that the Company has always attributed to the relationship with the customer, all stages of the credit recovery process are the subject of the utmost attention. Moreover, the effective management of complaints allows the Company to promptly identify the reasons that have caused the customer's discomfort or discontent and consequently initiate the appropriate corrective actions.

This approach is also consistent with the broader objective of implementing, within the context of sound and careful management, all the necessary actions to considerably reduce operational, reputational and legal risks by improving the company-customer relationship.

Cross Factor makes the following communication channels available to customers for the forwarding of any complaints, among others:

- ordinary mail - address "Cross Factor S.p.A. - Complaints Office - Via Terraggio, 17 - 20123 Milano
- ordinary e-mail - reclami@crossfactor.it
- certified e-mail (PEC) - crossfactor@legalmail.it

Quantitative data

In absolute terms, during the Reference Period the Company received a total of 26 complaints against a managed portfolio of 31,808 positions, equal to 0.08% of the managed portfolio.

It should be noted that during the previous year the Company received 37 complaints in respect of a managed portfolio of 29,068, equal to 0.12%. Therefore, although the numbers are not very significant compared to the size of the portfolio managed, the number of complaints has decreased.

The average processing time was approximately 17 days.

With reference to the typology, below is a table with a division between the different categories and a comparison with the previous year.

Typology	2019	2018
Reporting to the Risk Centre	12	29
Debt disallowance	11	3
Disputes relating to the management of mortgages	1	1
Disputes concerning the behaviour of managers and/or agents	2	2
Challenges relating to - issues related to the original contract transferred (interest rates, lending and borrowing account terms and commission regime)	-	1
Disputes related to the application of the GDPR	-	1
Total	26	37

Outcome of complaints

Out of the total number of complaints received, 22 were not upheld while 4 were upheld and none of the upheld complaints required a financial outlay.

Exposed to institutional bodies

Finally, it should be noted that clients have not had recourse to ABF or any other institutional body for any position.